



**THE CITY OF NEW YORK
LAW DEPARTMENT**
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June 27, 2022

VIA ECF

Hon. Ramon E. Reyes, Jr.
United States District Judge
United States District Court
Eastern District of New York
225 Camden Plaza
Brooklyn, NY 11201

Re: *Zuckerman v. Gonzalez, et al.*
22 CV 3384 (JP)(OTW)

Dear Judge Reyes:

I am an Assistant Corporation Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. I write to request that Your Honor extend the time for the individual defendants to respond to the Complaint in this action from July 5, 2022 until August 19, 2022. Plaintiff's counsel consents to this extension request.

Plaintiff Joshua Zuckerman brings the instant action pursuant to the First Amendment of the United States Constitution and 42 U.S.C. §§ 1983 asserting a claim of First Amendment Retaliation. Additionally, Plaintiff alleges violation of the New York State Constitution. Specifically, Plaintiff, a former Assistant District Attorney with the Kings County District Attorney's Office, claims that he was retaliated against for speaking out about COVID-19 safety in his workplace by being terminated.

Plaintiff's complaint does not name the City of New York, the Kings County District Attorney's Office or any other municipal defendant. Thus, I request an extension of time for my office to investigate service of the summons and complaint on the individually named defendants Eric Gonzalez, Maritza Mejia-Ming, Nicole Chavis and Gregory Thomas, and to make a determination pursuant to Section 50-k of the New York General Municipal Law as to whether it will represent them. Additional time is also requested to allow the undersigned to conduct an investigation into the facts of the case, including obtaining any underlying

documentation that may exist with respect to Plaintiff's allegations, and to formulate an appropriate response to the complaint. Further, additional time is required as I am preparing for a trial in the Southern District of New York in *Jones v. City of New York* (17 CV 489) which commences on July 20, 2022.

This is the first such request of this Court for additional time to respond to the Complaint. Accordingly, the City respectfully requests that the time to respond to the complaint be extended until August 19, 2022.

Respectfully submitted,

/s/ Dominique F. Saint-Fort
Dominique F. Saint-Fort
Senior Counsel

cc: Law Office of Kevin Mintzer, P.C. (via ECF)
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